

***IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA***

UNITED STATES OF AMERICA : NO. 2:22-CR-00352-NIQA-1
:
vs. :
:
LUIS TORRES :
:

ORDER

AND NOW, this _____ day of _____, 2022, it is hereby
ORDERED and **DECREED** that defendant's Motion for a Continuance of Trial is
GRANTED.

BY THE COURT:

J.

***IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA***

UNITED STATES OF AMERICA : NO. 2:22-CR-00352-NIQA-1

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vs.
:
:
:
:

LUIS TORRES :
:
:
:
:

MOTION FOR CONTINUANCE OF TRIAL

AND NOW, the defendant, Luis Torres, by and through his attorney, Louis T. Savino, Jr., Esquire, does file the within Motion and avers as follows:

1. The defendant, Luis Torres, has retained the legal services of Louis T. Savino, P.C. to represent him in the above captioned criminal matter.

2. Trial in this matter is scheduled for November 28, 2022 before the Honorable Nitza I. Quinones, United States District Judge United States District Court for the Eastern District of Pennsylvania.

3. A 90 (ninety) day continuance of trial is respectfully requested as additional time is needed for further investigation and

preparation. Additionally, further time is also needed to engage in plea negotiations with the government in the hopes of achieving a non-trial disposition.

4. The Government, through its representative, Mary Crawley, Esquire, (AUSA) has no objection to the within request.
5. It is respectfully submitted that the case in its present posture is untriable. It is also respectfully submitted that the ends of justice in the defendant's need to continue the trial for preparation purposes outweigh the public interest in a speedy disposition of the within matter. See, 18 U.S.C. § 3161 et seq.

WHEREFORE, for all of the foregoing reasons, it is respectfully requested that the within Motion be **GRANTED**.

Respectfully submitted,

By:


LOUIS T. SAVINO, ESQ.
Attorney for Defendant

CERTIFICATE OF SERVICE

Louis T. Savino, Esquire being duly sworn according to law, deposes and says that on the **14th day of November, 2022** a copy of the within document was served upon the following individuals via electronically:

Honorable Nitza I. Quinones
United States District Judge
United States District Court for the
Eastern District of Pennsylvania
United States Courthouse
601 Market Street
Philadelphia, PA 19106

Mary Crawley, Esquire
Office of the United States Attorney
Suite 1250
615 Chestnut Street
Philadelphia, PA 19106

Respectfully submitted,

By:


LOUIS T. SAVINO, ESQ.
Attorney for Defendant